

May 19, 2006

TO: Department of Ecology
FROM: Kahle Jennings, City of Centralia Assistant Utilities Director
SUBJECT: Comments on draft Phase II Stormwater Permit for Western Washington

Thank you for workshops and the opportunity to comment on this draft permit. Centralia has the following questions and comments on the draft permit listed by page number and line number.

Page 5, lines 9 and 10: We interpret this to mean that the requirements of the Phase II permit will not apply to the City's urban growth area until portions of the UGA are actually annexed into the city.

Page 12, line 9: An annual report documenting the City's SWMP is an aggressive requirement. Explain how this information will be used in a way that justifies this annual requirement. If it is not going to be used in a meaningful way we should not have to track it and report it.

Page 12, line 14 through 24: This will be a time and resource consuming requirement. Explain how this information will be used in a way that justifies this annual requirement. If it is not going to be used in a meaningful way we should not have to track it and report it.

Page 16, line 11: Does "Water from crawl space pumps" include sump pumps in basements?"

Page 16, line 15: The term "discharge" needs to be defined better than it is on page 44 lines 37 and 38. What do you mean by discharge? Does it mean coming from the end of a pipe or hose? Running off of a surface into a ditch that infiltrates into the ground or evaporates? Entering a surface water of the state?

Page 16, lines 16 through 21: In some cases the only alternative this may leave us is conveying potable water from a water line being flushed directly to the City's sanitary sewer system, which may put us at risk of violating our wastewater NPDES permit to comply with this Phase II stormwater permit. You need to make sure this requirement is thoroughly reviewed with Ecology staff responsible for administering wastewater NPDES permits and that they are in agreement before including it in the final permit.

Page 22, lines 10 through 26: This section represents a concern that really applies to the whole permit, and that concern is this: even with a stormwater utility and stormwater utility fees it may be very difficult (i.e. too expensive) to sustain a program that meets all these requirements. This will add to the financial hardship many small communities face that are just over the population threshold that requires coverage under this program.

Page 33, lines 13 through 15: I understand the reference to monitoring required for compliance with TMDLs identified in Appendix 2 but the reference to *S7* TMDL Requirements (page 32, lines 35 through 39) seems a little unclear. I interpret this to mean that monitoring is not required for TMDLs not identified in Appendix 2.

Page 37, line 5: Tracking and reporting details such as the number and type of inspections will be time consuming. Explain how this information will be used in a way that justifies this requirement. If it is not going to be used in a meaningful way we should not have to track it and report it?

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